



**TO:** Tricia Davini, Tax Manager  
Stockbridge Capital Group, LLC  
4 Embarcadero Ctr Ste 3300  
San Francisco, CA 94111-4184

**RE:** **Process Served in South Carolina**  
**FOR:** SCG PATRIOTS PLAZA, LP (Domestic State: DE)

## Service of Process

### Transmittal

05/06/2019

CT Log Number 535422385

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** GREGORY LASKY, Pltf. vs. SCO PATRIOTS PLAZA L.P., Dft.

**DOCUMENT(S) SERVED:** SUMMONS, COMPLAINT(S), COVER SHEET(S)

**COURT/AGENCY:** Charleston County Court of Common Pleas, SC  
Case # 2019CP101565

**NATURE OF ACTION:** Complaint for Violation of Federal Law Title III of the Americans with Disabilities Act, 42 U.S.C. 12101, Et Seq.

**ON WHOM PROCESS WAS SERVED:** CT Corporation System, Columbia, SC

**DATE AND HOUR OF SERVICE:** By Process Server on 05/06/2019 at 08:15

**JURISDICTION SERVED :** South Carolina

**APPEARANCE OR ANSWER DUE:** Within 30 Days After Service Hereof, Exclusive of the Day of Such Service

**ATTORNEY(S) / SENDER(S):** Anthony J. Brady, Jr.  
Law Office of Anthony Brady, Jr.  
1670-9 Springdale Drive  
PMB 159.  
Camden, SC 29020  
561-603-8387

**REMARKS:** (Underlined) The documents received have been modified to reflect the name of the entity being served.

**ACTION ITEMS:** SOP Papers with Transmittal, via UPS Next Day Air , 1ZX212780131058375  
Image SOP

**SIGNED:**  
**ADDRESS:** CT Corporation System  
2 Office Park Court  
Suite 103  
Columbia, SC 29223

**TELEPHONE:** 302-658-7581

STATE OF SOUTH CAROLINA ) THE COURT OF COMMON  
) PLEAS

COUNTY OF CHARLESTON ) 9<sup>TH</sup> JUDICIAL CIRCUIT

2019-CP-10-1565

GREGORY LASKY )  
)  
Plaintiff, ) FILE NO.  
vs. )  
SCG PATROITS PLAZA L.P. )  
)  
Defendant(s). ) SUMMONS

2019 MAR 27 AM 10:13  
JULIE J. CHRISTIAN  
CLERK OF COURT  
BY

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

Camden, South Carolina.

Dated: March 17, 2019.

Address: Anthony J. Brady Jr.  
1670-9 Springdale Drive  
PMB 159  
Camden, South Carolina 29020  
561-603-8387  
Email: [Ladbrady@gmail.com](mailto:Ladbrady@gmail.com)  
Attorney ID. 15506

S/Anthony Brady

Plaintiff/Attorney for Plaintiff

RCSD

RECEIVED  
MAY -2 PM 2:52

STATE OF SOUTH CAROLINA	)	THE COURT OF COMMON PLEAS	9 <sup>TH</sup> JUDICIAL CIRCUIT 2019-CP-10-1565	JUL 16 2019 CLERK OF COURT	AM 10:13
COUNTY OF CHARLESTON	)				
GREGORY LASKY	)	CASE NO.			
Plaintiff,	)	Civil Action			
vs.	)				
SCG PATROITS PLAZA L.P	)	COMPLAINT			
Defendant(s).	)				

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Plaintiff, residing at 20 South Main Street ,Glassboro, New Jersey by way of complaint against the Defendant states:

1. This Honorable Court has jurisdiction in that it is a Court of general jurisdiction and the Plaintiff has alleged a violation of federal law Title III of the Americans with Disabilities Act, 42 U.S.C. § 12101, et seq. Plaintiff's' claim is greater than \$15,000.00 and venue is proper in Charleston County because the cause of action arose in Charleston County and that Defendant resides in Charleston County.

#### **PARTIES**

2. Plaintiff, resides at 20 South Main Street St Glassboro New Jersey who used to reside in South Carolina. He is a disabled man because of a medical mishap becoming has partial Tetraplegia. As a result he cannot walk and uses a wheelchair. He qualifies as an individual with disabilities as defined by the federal Americans with Disabilities Act (ADA).

3. The defendants own, lease, leases to, or operates a place of public accommodation as defined by the ADA. The property that is the subject of this suit is a shopping mall commonly called

Patriots Plaza, located a 845 Houston Northcutt Mt. Pleasant, Charleston County, South Carolina.

#### **STATEMENT OF THE CASE.**

This suit is a private action brought by a Plaintiff, who uses a wheelchair as a result of being a quadriplegic, for injunctive relief under the federal American with Disabilities Act, 42 USC 12182.

It would be wise to review the purposes of the access laws. First, the laws are about opportunity; as former Speaker of the House Gingrich has stated, "Mr. Chairman, throughout our history, our disabled citizens have not been provided the opportunity to participate in all phases of society. Designed to provide 43,000,000 Americans with enhanced opportunities, this bill, then, embodies the conservative idea of opportunity." 136 Cong. Rec. H2631 (daily ed. May 22, 1990) (Statement of Rep. Gingrich).

Second, the law is about the economic wellbeing of America. As former Attorney General Thornburgh testified, "We must recognize that passing comprehensive civil rights legislation protecting persons with disabilities will have direct and tangible benefits for our country. Certainly,...the mainstreaming of persons with disabilities will result...in more persons with disabilities working, in increasing earnings, in less dependence on the Social Security System for financial support, in increased spending on consumer goods, and increased tax revenues." Testimony before House Committee on Civil and Constitutional Rights, Ser No. 101-58, Oct. 11, 1989, p. 811.

Third, the law is to end segregation. As Senator Kennedy stated, "The Americans With Disabilities Act will end this American apartheid. It will roll back the unthinking and unacceptable practices by which disabled Americans today are segregated, excluded, and fenced off from fair participation in our society by mindless biased attitudes and senseless physical barriers. 35 Cong. Rec. 54993 (daily ed. May 09, 1989) (Statement of Sen. Kennedy).

It is, respectfully, submitted that Senator Dole's opinion that the access laws are about dignity,

"Living independently and with dignity means opportunity to participate fully in every activity of daily life" 136 Cong. Rec. S9695 (daily ed. July 13, 1990) (Statement of Sen. Dole).

Plaintiffs seek an award of injunctive relief attorney fees and costs as a private attorney general. The Courts have explained the role of private enforcement of the access laws. The 9<sup>th</sup> Circuit explained, "For the ADA to yield its promise of equal access for the disabled it may be indeed necessary and desirable for committed individuals to bring serial litigation advocating the time when public accommodations will be compliant with the ADA", D'Lil v. Best Western Encino-Lodge & Suites, 538 F.3d 1031 (9<sup>th</sup> Cir. 2008).

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#### **FIRST COUNT.**

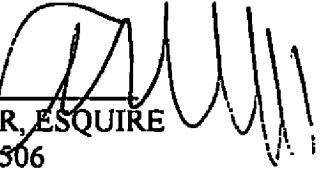
4. Plaintiff is a frequent traveler to Charleston, South Carolina because
5. On numerous occasions including September 12, 2018 Lasky was a guest at Defendants' Shopping Mall.
6. His ability to use the services of the shopping mall was impaired because of lack of proper Access to him and the disabled as a whole.
7. Specially, the shopping mall parking does not provide proper parking for the disabled in that it is on acute slopes has lack of proper signage not enough spaces. In that Lasky is a wheelchair user it is more difficult for him to travel from point A to B, therefore, he has been discriminated against under the ADA.

11. The above violations are violations of the federal ADA Title II.
12. The discriminatory violations described above are not an exclusive list of the defendants' accessibility problems/violations. Plaintiff requires an inspection to identify all barriers.
14. The plaintiff intends to be a frequent patron of defendants, when it complies with the ADA. He will also return as a tester.
15. Plaintiff seeks equitable relief in that to create access is readily achievable if the above violations are pre-existing construction.
16. Plaintiff reserves the right to file administrative remedies for damages under South Carolina law.

Wherefore, plaintiff Lasky seeks:

- a) Injunctive relief under the ADA.
- b) Attorney fees and costs of suit under the ADA.

Date: March 17, 2019.

By: s/Anthony J. Brady, Jr.   
ANTHONY J. BRADY, JR., ESQUIRE  
South Carolina Bar No. 15506  
Law Office of Anthony Brady, Jr.  
1670-9 Springdale Drive  
PMB 159.  
Camden, South Carolina 29020  
Email: [ladbrady@gmail.com](mailto:ladbrady@gmail.com)  
5616036387

STATE OF SOUTH CAROLINA

COUNTY OF CharlestonL49K7

Plaintiff(s)

vs.

SC G Petrol, Plaza LP

Defendant(s)

Submitted By: Anthony J. Brady Jr.  
Address: 1670 - 91 Springbank Dr.  
PMB 1959  
Charleston, SC 29420

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.

## DOCKETING INFORMATION (Check all that apply)

\*If Action is Judgment/ Settlement do not complete

JURY TRIAL demanded in complaint.  NON-JURY TRIAL demanded in complaint.  
 This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
 This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
 This case is exempt from ADR. (Proof of ADR/Exemption Attached)

## NATURE OF ACTION (Check One Box Below)

Contracts  
 Constructions (100)  
 Debt Collection (110)  
 General (130)  
 Breach of Contract (140)  
 Fraud/Bad Faith (150)  
 Failure to Deliver/Warranty (160)  
 Employment Discrim (170)  
 Employment (180)  
 Other (199)

Inmate Petitions  
 PCR (500)  
 Mandamus (520)  
 Habeas Corpus (530)  
 Other (599)

Torts - Professional Malpractice  
 Dental Malpractice (200)  
 Legal Malpractice (210)  
 Medical Malpractice (220)  
Previous Notice of Intent Case #  
20-NL-  
 Notice/ File Med Mal (230)  
 Other (299)

Administrative Law/Relief  
 Reinstate Drv. License (800)  
 Judicial Review (810)  
 Relief (820)  
 Permanent Injunction (830)  
 Forfeiture-Petition (840)  
 Forfeiture—Consent Order (850)  
 Other (899)

Special/Complex /Other  
 Environmental (600)  
 Automobile Arb. (610)  
 Medical (620)  
 Other (699)  
 Sexual Predator (510)  
 Permanent Restraining Order (680)  
 Interpleader (690)

Submitting Party Signature: Anny

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2019-CP-10-1565

SC Bar #: 15506Telephone #: 561-603-6387

Fax #:

Other:

E-mail: L49Brady6@gmail.com

Torts – Personal Injury  
 Conversion (310)  
 Motor Vehicle Accident (320)  
 Premises Liability (330)  
 Products Liability (340)  
 Personal Injury (350)  
 Wrongful Death (360)  
 Assault/Battery (370)  
 Slander/Libel (380)  
 Other (399)

Real Property  
 Claim & Delivery (400)  
 Condemnation (410)  
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Judgments/ Settlements  
 Death Settlement (700)  
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Appeals  
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 Probate Court (940)  
 SCDOT (950)  
 Worker's Comp (960)  
 Zoning Board (970)  
 Public Service Comm. (990)  
 Employment Security Comm (991)  
 Other (999)

Date: 3/21/19

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

STATE OF SOUTH CAROLINA ) THE COURT OF COMMON  
 ) PLEAS

COUNTY OF CHARLESTON ) 9<sup>TH</sup> JUDICIAL CIRCUIT

2019-CP-10-1565

GREGORY LASKY )  
 ) Plaintiff, ) FILE NO.  
 vs. )  
 )  
 SCG PATROITS PLAZA L.P. ) SUMMONS  
 )  
 Defendant(s). )

2019 MAR 27 AM 10:13  
JULIE J. BRISTOL  
CLERK OF COURT

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

Camden, South Carolina.

Dated: March 17, 2019.

S/Anthony Brady

Plaintiff/Attorney for Plaintiff

Address: Anthony J. Brady Jr.  
1670-9 Springdale Drive  
PMB 159  
Camden, South Carolina 29020  
561-603-8387  
Email: [Ladbrady@gmail.com](mailto:Ladbrady@gmail.com)  
Attorney ID. 15506

STATE OF SOUTH CAROLINA	)	THE COURT OF COMMON PLEAS	9 <sup>TH</sup> JUDICIAL CIRCUIT 2019-CP-10-1565	JUDGE CLERK OF COURT ADMINISTRATIVE COURT	2019 MAR 27 AM 10:13
COUNTY OF CHARLESTON	)				
GREGORY LASKY	)	CASE NO.			
Plaintiff,	)	Civil Action			
vs.	)				
SCG PATROITS PLAZA L.P.	)	COMPLAINT			
Defendant(s).	)				

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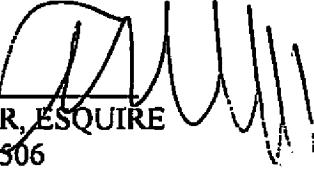
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Date: March 17, 2019.

By: s/Anthony J. Brady, Jr.   
ANTHONY J. BRADY, JR., ESQUIRE  
South Carolina Bar No. 15506  
Law Office of Anthony Brady, Jr.  
1670-9 Springdale Drive  
PMB 159  
Camden, South Carolina 29020  
Email: [ladbrady@gmail.com](mailto:ladbrady@gmail.com)  
5616036387

STATE OF SOUTH CAROLINA

COUNTY OF CharlestonL43K7

Plaintiff(s)

vs.

SC G Petrait, Plaintiff

Defendant(s)

Submitted By: Anthony 3 Bruch 35 E,  
Address: 1670-67 Spring St Dr. 2  
PMB 1959  
Camden, SC 29020

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 Interpleader (690)

Pharmaceuticals (630)  
 Unfair Trade Practices (640)  
 Out-of State Depositions (650)  
 Motion to Quash Subpoena in an Out-of-County Action (660)  
 Pre-Suit Discovery (670)

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 Incapacitated Adult Settlement (790)  
 Other (799) \_\_\_\_\_

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Submitting Party Signature:

AM

Date:

3/21/19

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 ) PLEAS

COUNTY OF CHARLESTON ) 9<sup>TH</sup> JUDICIAL CIRCUIT

2019-CP-10-1565

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S/Anthony Brady

Plaintiff/Attorney for Plaintiff



Address: Anthony J. Brady Jr.  
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Email: [Ladbrady@gmail.com](mailto:Ladbrady@gmail.com)  
Attorney ID. 15506

STATE OF SOUTH CAROLINA	)	THE COURT OF COMMON PLEAS	9 <sup>TH</sup> JUDICIAL CIRCUIT CLERK OF COURT 2019 MAR 27 AM 10:13
COUNTY OF CHARLESTON	)	2019-CP-10-1565	
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vs.		)	
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Defendant(s).		)	

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"Living independently and with dignity means opportunity to participate fully in every activity of daily life" 136 Cong. Rec. S9695 (daily ed. July 13, 1990) (Statement of Sen. Dole).

Plaintiffs seek an award of injunctive relief attorney fees and costs as a private attorney general. The Courts have explained the role of private enforcement of the access laws. The 9<sup>th</sup> Circuit explained, "For the ADA to yield its promise of equal access for the disabled it may be indeed necessary and desirable for committed individuals to bring serial litigation advocating the time when public accommodations will be compliant with the ADA", D'Lil v. Best Western Encino-Lodge & Suites, 538 F.3d 1031 (9<sup>th</sup> Cir. 2008).

In Walker v. Guiffre, 200 N.J. 124, 156 (2012) in awarding an enhancement in a state case held, "Her obligation served not her sole interests, but the interests of any and all who had been or who might otherwise in the future have been denied access to the premises. The relief sought, both, because it was equitable in nature and because it was designed to serve a broad social purpose weighs in favor of a continuous enhancement at the highest end of the spectrum."

#### **FIRST COUNT.**

4. Plaintiff is a frequent traveler to Charleston, South Carolina because
5. On numerous occasions including September 12, 2018 Lasky was a guest at Defendants' Shopping Mall.
6. His ability to use the services of the shopping mall was impaired because of lack of proper Access to him and the disabled as a whole.
7. Specially, the shopping mall parking does not provide proper parking for the disabled in that it is on acute slopes has lack of proper signage not enough spaces. In that Lasky is a wheelchair user it is more difficult for him to travel from point A to B, therefore, he has been discriminated against under the ADA.

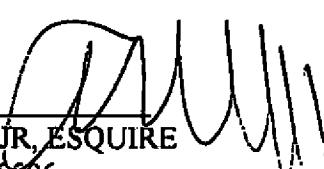
11. The above violations are violations of the federal ADA Title III.
12. The discriminatory violations described above are not an exclusive list of the defendants' accessibility problems/violations. Plaintiff requires an inspection to identify all barriers.
14. The plaintiff intends to be a frequent patron of defendants, when it complies with the ADA. He will also return as a tester.
15. Plaintiff seeks equitable relief in that to create access is readily achievable if the above violations are pre-existing construction.
16. Plaintiff reserves the right to file administrative remedies for damages under South Carolina law.

Wherefore, plaintiff Lasky seeks:

- a) Injunctive relief under the ADA.
- b) Attorney fees and costs of suit under the ADA.

Date: March 17, 2019.

By: s/Anthony J. Brady, Jr.  
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STATE OF SOUTH CAROLINA )  
 COUNTY OF Charleston )  
L-43-N-7 Plaintiff(s) )  
 vs. )  
SC G Portrait, Plaza LP )  
 Defendant(s) )  
 Submitted By: Anthony J. Brady 3 Brach 35 E, )  
 Address: 1670 - 67 Springwell Dr. )  
PMB 1458 )  
Camden, SC 29020

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.

## IN THE COURT OF COMMON PLEAS

## CIVIL ACTION COVERSHEET

2019-CP-10-1506

SC Bar #: 15506Telephone #: 561-603-6387

Fax #:

Other:

E-mail: L-43-N-7-N-7@GMAIL.COM

## DOCKETING INFORMATION (Check all that apply)

\*If Action is Judgment/ Settlement do not complete

JURY TRIAL demanded in complaint.  NON-JURY TRIAL demanded in complaint.  
 This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
 This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
 This case is exempt from ADR. (Proof of ADR/Exemption Attached)

## NATURE OF ACTION (Check One Box Below)

## Contracts

Constructions (100)  
 Debt Collection (110)  
 General (130)  
 Breach of Contract (140)  
 Fraud/Bad Faith (150)  
 Failure to Deliver/ Warranty (160)  
 Employment Discrim (170)  
 Employment (180)  
 Other (199) \_\_\_\_\_

## Inmate Petitions

PCR (500)  
 Mandamus (520)  
 Habeas Corpus (530)  
 Other (599) \_\_\_\_\_

## Torts - Professional Malpractice

Dental Malpractice (200)  
 Legal Malpractice (210)  
 Medical Malpractice (220)  
 Previous Notice of Intent Case #  
 20 \_\_\_\_\_-NI-\_\_\_\_\_

Notice/ File Med Mal (230)  
 Other (299) \_\_\_\_\_

## Torts - Personal Injury

Conversion (310)  
 Motor Vehicle Accident (320)  
 Premises Liability (330)  
 Products Liability (340)  
 Personal Injury (350)  
 Wrongful Death (360)  
 Assault/Battery (370)  
 Slander/Libel (380)  
 Other (399) \_\_\_\_\_

## Real Property

Claim & Delivery (400)  
 Condemnation (410)  
 Foreclosure (420)  
 Mechanic's Lien (430)  
 Partition (440)  
 Possession (450)  
 Building Code Violation (460)  
 Other (499) \_\_\_\_\_

## Special/Complex /Other

Environmental (600)  
 Automobile Arb. (610)  
 Medical (620)  
 Other (699) \_\_\_\_\_  
 Sexual Predator (510)  
 Permanent Restraining Order (680)  
 Interpleader (690)

Pharmaceuticals (630)  
 Unfair Trade Practices (640)  
 Out-of State Depositions (650)  
 Motion to Quash Subpoena in an Out-of-County Action (660)  
 Pre-Suit Discovery (670)  
 Other (799) \_\_\_\_\_

## Judgments/ Settlements

Death Settlement (700)  
 Foreign Judgment (710)  
 Magistrate's Judgment (720)  
 Minor Settlement (730)  
 Transcript Judgment (740)  
 Lis Pendens (750)  
 Transfer of Structured Settlement Payment Rights Application (760)  
 Confession of Judgment (770)  
 Petition for Workers Compensation Settlement Approval (780)  
 Incapacitated Adult Settlement (790)  
 Other (799) \_\_\_\_\_

## Appeals

Arbitration (900)  
 Magistrate-Civil (910)  
 Magistrate-Criminal (920)  
 Municipal (930)  
 Probate Court (940)  
 SCDOT (950)  
 Worker's Comp (960)  
 Zoning Board (970)  
 Public Service Comm. (990)  
 Employment Security Comm (991)  
 Other (999) \_\_\_\_\_

Submitting Party Signature: Anthony J. BradyDate: 3/21/19

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et seq.